

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

<b>UNITED STATES SECURITIES AND EXCHANGE COMMISSION,</b>	)
	)
	)
<b>Plaintiff,</b>	)
	)
	)
<b>v.</b>	) Case No. 17-cv-00415
	)
<b>MICHEAL A. SKERRY,</b>	)
	)
<b>Defendant.</b>	)
	)

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**DECLARATION OF WILBURN SAYLOR, JR.**

1. I, Wilburn Saylor, Jr., am a senior accountant with the United States Securities and Exchange Commission (“Commission”) in its Chicago Regional Office, located at 175 West Jackson Boulevard, Suite 1450, Chicago, Illinois 60604. I have been employed as an accountant by the Commission since January 2009. My official duties with the Commission include participating in fact-finding inquiries and investigations to determine whether the federal securities laws have been, are presently being, or are about to be violated, and assisting in the Commission’s litigation of enforcement actions.

2. I received a Bachelor of Science in Accountancy from the University of Illinois and a Masters of Business Administration from Northwestern University. I am a registered Certified Public Accountant.

3. I was assigned to assist in the Commission’s investigation related to Success Holding Group International, Inc. (“Success Holding”) that led to the above-captioned case. In connection with that assignment, I have undertaken various tasks to assist the Commission’s

attorneys in the Chicago Regional Office in conducting the investigation. Among other things, I have reviewed bank records, stock trading records, other documents produced to the Commission, various websites and publicly-available information. The Commission's files related to this investigation are stored in the Chicago Regional Office. I also have participated in investigative interviews and testimonies of individuals with knowledge relating to the investigation.

4. My declaration is based upon my personal knowledge, and my review and analysis of the records available in the Commission's files.

5. On June 15, 2016, I attended an investigative testimony of Brian Kistler conducted by Commission staff. I also have reviewed portions of the transcript of his testimony and related exhibits. I have attached excerpts of the transcript and related exhibits as Exhibit 1 to this Declaration.

6. On August 10, 2016, an investigative testimony of Mark Behringer was conducted by Commission staff. I have reviewed portions of the transcript of his testimony and related exhibits. I have attached excerpts of the transcript and related exhibits as Exhibit 2 to this Declaration.

7. On August 12, 2016, an investigative testimony of Taihwa Terry Ho was conducted by Commission staff. I have reviewed portions of the transcript of his testimony and related exhibits. I have attached excerpts of the transcript and related exhibits as Exhibit 3 to this Declaration.

8. On December 7, 2016, I attended an investigative interview of Steven Chen and Chris Hong conducted by Commission staff. During the interview, Chen stated that he resides in Asia.

9. In connection with the Commission's investigation, I reviewed and analyzed certain documents produced to the Commission by Success Holding. The documents included email communications and attachments. I have attached some of the emails as Exhibit 4 to this Declaration.

10. In connection with the Commission's investigation, I reviewed and analyzed the Form 10-K filed by Success Holding on March 10, 2015, which provided a corporate address in Fort Wayne, Indiana and was signed by Brian Kistler. I have attached excerpts from the Form 10-K as Exhibit 5 to this Declaration.

11. In connection with the Commission's investigation, I researched press releases issued by Success Holding. I found press releases issued by the company on publicly available websites such as [www.otcmarkets.com](http://www.otcmarkets.com) and [www.successholding.com](http://www.successholding.com).

12. I also reviewed and analyzed trading data for the common stock of Success Holding for the period July 1, 2014 to December 31, 2014. I noted that investors from at least 20 different states purchased Success Holding common stock during that period.

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I, Wilburn Saylor, Jr., declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on November 13, 2017.

s/ Wilburn Saylor, Jr.  
Wilburn Saylor, Jr.